

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

SIGNE BERGMAN, an individual,

Plaintiff,

v.

IVAN MOTO, an individual,

Defendant.

No. 2:22-cv-161

**COMPLAINT FOR ASSAULT AND
BATTERY, INCLUDING SEXUAL
ASSAULT**

JURY DEMAND

Plaintiff Signe Bergman (“Wife”), by and through her attorneys Dennis McGlothlin and Robert Cadranel, sues Defendant Ivan Moto (“Husband”), and alleges as follows:

I. INTRODUCTION

1. This is a civil action seeking damages for assault and battery, including sexual assault, non-consensual sexual relations, and marital rape.

II. JURISDICTION

2. Plaintiff invokes this court's supplemental jurisdiction to assert the State law claims of assault and battery and the State law claims of sexual assault, non-consensual sexual relations, and marital rape.

3. This court has jurisdiction pursuant to 28 U.S.C.A. § 1332 because the parties

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1 are citizens of different states, with Plaintiff being a citizen of the State of Washington and
2 Defendant being a citizen of the State of California, and the amount in controversy is greater
3 than \$75,000.
4

5 **III. VENUE**

6 4. Venue lies in this District pursuant to 28 U.S.C.A. § 1391(b)(2) since the
7 events giving rise to Plaintiff's claims occurred in this District.
8

9 **IV. PARTIES**

10 5. Plaintiff Signe Bergman in an individual residing in the State of Washington.

11 6. Defendant Ivan Moto is an individual residing in San Diego County, in the
12 State of California.

13 **V. FACTUAL ALLEGATIONS**

14 7. The parties to this action were in a short-term marriage that lasted about two
15 years. They are currently in process of a marital dissolution under King County Superior
16 Court no. 21-3-01277-9 SEA. There are no children.
17

18 8. During the marriage, the Plaintiff/Wife endured sexual, physical, emotional,
19 and verbal abuse committed by the Defendant/Husband.

20 9. The parties met on March 7th, 2016 in Seattle, King County, Washington.
21 Husband was 24 and worked as a Quality Assurance Engineer, testing software at Amazon, in
22 Seattle, Washington, where he was first employed. Wife was then 18 and in her first year of
23 college, studying Oceanography at the University of Washington. Within a month, they made
24 a mutual commitment to one another that they would have a monogamous relationship.
25 Despite their mutual commitment to one another, Husband expressed his entitlement to be
26

1 intimate with other people and later demanded that he be allowed to have the freedom to be in
2 an “open relationship” while not agreeing to Wife disobeying her monogamy pledge.
3

4 10. Husband broke up with her twice to be intimate with other people. The second
5 break up was on March 8, 2017, the night before Wife had her final exams. A few weeks
6 later, however, he reaffirmed his monogamy pledge, and the couple reunited. Then Husband
7 began expressing his desire that he be allowed to be in an open relationship and be allowed to
8 be intimate with other women. This back-and-forth continued throughout their relationship.
9

10 11. The couple married and moved in together in June 2018. Upon living together,
11 Husband struggled and treated Wife like she was a burden to him and accused her of being
12 “too needy.”

13 12. Wife, who wanted to spend time with her new Husband, felt rejected as
14 Husband rebuffed her and stared into his computers for hours rather than interact with her.
15 Admittedly, however, Husband was studying at Amazon Technical Academy to become a
16 software engineer, but even after his program was finished and during his free time, he
17 continued to neglect Wife and dismiss or marginalize her wants and needs.
18

19 13. This treatment affected her academic performance. During the summer of
20 2018, she took a differential equations class and received a grade of 1.6 - the lowest grade of
21 her academic career.

22 14. This was very uncharacteristic for her. In senior high school she was a 4.0
23 student and valedictorian of her class, and in college, she continued to study very hard. But,
24 with the emotional upheaval caused by Husband’s behavior, she felt as though her marriage to
25 the man she loved was more like an arrangement and not a marriage.
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1
2 15. During this time Husband was controlling and physically abusive to Wife.
3 Whenever Wife did something Husband disagreed with, he would “discipline” her by hitting
4 her with his hand or a wooden spoon causing pain to the point that Wife began crying.

5 16. Husband dictated the division of housework each of them would do and
6 required Wife to do all the cooking for him upon demand. Then he would constantly criticize
7 her for doing a poor job at the tasks he assigned her.

8 17. Husband’s behavior took its toll on Wife. In September 2018, she was
9 diagnosed with situational major depressive disorder for the first time in her life.
10

11 18. Husband began forcing Wife to perform sexual acts to satisfy his “needs.”
12 Wife protested and consistently said “no,” but Husband said it was his right now that they
13 were married.

14 19. Husband, he belittled her chosen program of study and said she should switch
15 to a real program like computer science. Despite Husband’s discouragement, Wife graduated
16 in August 2019.
17

18 20. When Wife graduated, the couple were living in their second home on Capitol
19 Hill. Husband had completed his program at Amazon Technical Academy and had switched
20 to a software engineering role at Amazon Web Services at the beginning of that year.

21 21. Husband continued to neglect Wife and avoided her by saying he needed to
22 study and then work and would go into his office and lock the door.

23 22. When he emerged, it was either to eat or demand (and force) wife to perform
24 sex acts whenever he demanded and even though Wife adamantly said no.
25

26 23. When Wife awoke on March 5, 2020, Husband was not just upset and angry,
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1 but as Wife says he became “extremely angry, angrier than ever before.” Husband sat on top
2 of her, and with his legs he pinned her arms to her side so she could not move. Then he
3 proceeded to slap her repeatedly in the face with the back of his hand causing pain.
4

5 24. During this incident, Wife was crying and feared for her physical safety and
6 even her life.

7 25. While Wife was crying, Husband sexually assaulted her over her avid refusal
8 and vocal protestations. Husband videorecorded it. Afterward, Husband paced around the
9 room and said, “I want to kill you...No, you should kill yourself, so I don’t get in trouble.”
10

11 26. After discussion, the couple took a break from living together on May 22,
12 2020, and Wife left the Capitol Hill residence on May 26, 2020. On August 22, 2020, she
13 realized that she needed to end the abusive relationship with Husband and told him that she
14 had given up hope of reconciliation and wanted a divorce.

15 27. As late as January, 2021, Husband communicated with Wife requesting the
16 two of them go to counselling and renew their marital relations.
17

18 VI. COUNT I – ASSAULT

19
20 28. Plaintiff repeats and realleges the allegations contained in paragraphs 1
21 through 27 above as if fully set forth here.

22 29. Defendant violated Plaintiff's civil rights under State law by assaulting her.

23 30. As a result of Defendant’s violation of Plaintiff's civil rights, Plaintiff suffered
24 damages in an amount to be determined at trial, but in no event less than \$75,000.
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26

VII. COUNT II – BATTERY

31. Plaintiff repeats and realleges the allegations contained in paragraphs 1 through 27 above as if fully set forth here.

32. Defendant violated Plaintiff's civil rights under State law by inflicting a battery on her.

33. As a result of Defendant's violation of Plaintiff's civil rights, Plaintiff suffered damages in an amount to be determined at trial, but in no event less than \$75,000.

VIII. COUNT III – SEXUAL ASSAULT

34. Plaintiff repeats and realleges the allegations contained in paragraphs 1 through 27 above as if fully set forth here.

35. Defendant violated Plaintiff's civil rights under State law by sexually assaulting her.

36. As a result of Defendant's violation of Plaintiff's civil rights, Plaintiff suffered damages in an amount to be determined at trial, but in no event less than \$75,000.

IX. COUNT IV – MARITAL RAPE

37. Plaintiff repeats and realleges the allegations contained in paragraphs 1 through 27 above as if fully set forth here.

38. Defendant violated Plaintiff's civil rights under State law by raping her.

39. As a result of Defendant's violation of Plaintiff's civil rights, Plaintiff suffered damages in an amount to be determined at trial, but in no event less than \$75,000.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests the Court grant relief as follows:

- A. Judgment and Order against Defendant awarding Plaintiff damages in an amount to be proven at trial, but in no event less than \$75,000.
- B. An award to Plaintiff of all statutory costs permitted by law;
- C. An award to Plaintiff of all reasonable attorney fees incurred;
- D. An allowance of post-judgment interest at the highest rate allowed by law;
- E. Such other and further equitable and legal relief as the court deems just and equitable, including exemplary or punitive damages, civil penalties, or other extenuations in awards allowed under applicable laws.

DATED this 9th day of February, 2022.

WESTERN WASHINGTON LAW GROUP, PLLC

/s/ Robert J. Cadranell

Robert J. Cadranell, WSBA #41773

/s/ Dennis J. McGlothin

Dennis J. McGlothin, WSBA #28177

Attorneys for Plaintiff